
From: Rukavina, Davor
Sent: Tuesday, March 7, 2023 9:51 AM CST
To: Eric Schaffer
Subject: FW: Goodman/Prosperity

What do you think? I smell stalling. I'm inclined to advise Scott to just file the complaint.

Davor Rukavina, Esq.

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From: Argeroplos, Victoria <vargeroplos@jw.com>
Sent: Tuesday, March 7, 2023 9:50 AM
To: Rukavina, Davor <drukavina@munsch.com>
Cc: Eric Schaffer <eschaffer@stonecipherlaw.com>; Funk, Brenda <bfunk@munsch.com>
Subject: RE: Goodman/Prosperity

External Email: Use caution with links and attachments.

I asked you for the deposition transcripts. Not a lot.

Victoria Argeroplos

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From: Rukavina, Davor <drukavina@munsch.com>
Sent: Tuesday, March 7, 2023 9:47 AM
To: Argeroplos, Victoria <vargeroplos@jw.com>
Cc: Eric Schaffer <eschaffer@stonecipherlaw.com>; Funk, Brenda <bfunk@munsch.com>
Subject: RE: Goodman/Prosperity

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Victoria, what information do you need? I know you requested a lot of the information from the discovery that was taken but at the end of the day it is very simple: was there or was there not consideration for the assignment.

Davor Rukavina, Esq.

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From: Argeroplos, Victoria <vargeroplos@jw.com>

Sent: Tuesday, March 7, 2023 9:45 AM

To: Rukavina, Davor <drukavina@munsch.com>

Cc: Eric Schaffer <eschaffer@stonecipherlaw.com>; Funk, Brenda <bfunk@munsch.com>

Subject: RE: Goodman/Prosperity

External Email: Use caution with links and attachments.

Hi Davor,

I've been in touch with Eric about this and am doing everything I can to push this along. No need to file the complaint or threaten a refusal to settle. I've not received any of the information I requested from you, either.

I've got a call scheduled with the Bank tomorrow. Decisionmakers have been out of town and they need to comply with their internal process. Surely you understand that. The Bank knows I expect them to give me a clear instruction when we talk tomorrow morning. I anticipate that I will be following up with a draft 9019.

Victoria Argeroplos

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From: Rukavina, Davor <drukavina@munsch.com>

Sent: Tuesday, March 7, 2023 9:39 AM

To: Argeroplos, Victoria <vargeroplos@jw.com>

Cc: Eric Schaffer <eschaffer@stonecipherlaw.com>; Funk, Brenda <bfunk@munsch.com>

Subject: Goodman/Prosperity

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Victoria:

We have not heard anything from Prosperity. Therefore, we will be filing the attached tonight. Please let us know right away if Prosperity is prepared to accept the Trustee's settlement offer or if it believes it has any principled defense to the Trustee's claims. We have not heard of one and are not aware of one. Please understand that, if the Trustee is forced to file the attached, the settlement offer is off the table.

Thank you

Davor Rukavina, Esq.

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